WILKERSON • BRYAN

WILKERSON & BRYAN, P.C.
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET
MONTGOMERY, ALABAMA 36104
TEL. 334.265.1500

DANA H. BILLINGSLEY

dana@wilkersonbryan.com February 27, 2008 MAILING ADDRESS
POST OFFICE BOX 830
36101-0830
FAX 334.265.0319

By Federal Express

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 30554

Attn: Chief, Media Bureau

Mon-Cre Telephone Cooperative, Inc.'s Annual 47 C.F.R. § 64.2009(e) CPNI

Compliance Certification EB Docket No. 06-36

Dear Ms. Dortch:

Re:

On behalf of Mon-Cre Telephone Cooperative, Inc., we submit the original and four (4) copies of the above-referenced annual CPNI Compliance Certification. We have also filed a copy of this Certification electronically in EB Docket No. 06-36 and have provided two (2) courtesy copies to the Commission's Enforcement Bureau and one (1) copy to Best Copy and Printing, Inc., as required under the Commission's Public Notice, DA 08-171 (released January 29, 2008).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.

Dana H. Billingsley

Attorney for Mon-Cre Telephone Cooperative, Inc.

Wilkerson & Bryan, P.C. 405 South Hull Street

Montgomery, Alabama 36104 Telephone: (334) 265-1500

Facsimile: (334) 265-0319

Email: dana@wilkersonbryan.com

Enclosure

cc: David Hubbard

FCC Enforcement Bureau Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007
Date filed: February 27, 2008
Name of company covered by this certification: Mon-Cre Telephone Cooperative, Inc.
Form 499 Filer ID: 806382
Name of signatory: David Hubbard
Title of signatory: _General Manager
In response to the Commission's Public Notice, DA 08-171 (released January 29, 2008), Mon-Cre Telephone Cooperative, Inc., states as follows:
I, David Hubbard certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. §§ 64.2001, et seq.
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in sections 64.2001, et seq. of the Commission's rules.
The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.
The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosures of CPNI.
Signed Macan

Before the Federal Communications Commission Washington, D.C. 20554

ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF MON-CRE TELEPHONE COOPERATIVE, INC.

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Mon-Cre Telephone Cooperative, Inc. (hereinafter "Mon-Cre") files the following statement of compliance with the requirements set forth in 47 C.F.R. §§ 64.2001, *et seq.* on behalf of Mon-Cre:

- 1. I have personal knowledge that Mon-Cre has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- 2. I have personal knowledge that Mon-Cre obtains written approval for the use of its customers' CPNI and that Mon-Cre has notified its customers of their right to restrict Mon-Cre's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
- 3. I have personal knowledge that Mon-Cre has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. §§ 64.2001, *et seq.* and that Mon-Cre has an express disciplinary process in place to deal with breaches of CPNI.
- 4. I have personal knowledge that Mon-Cre implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
- 5. I have personal knowledge that Mon-Cre maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Mon-Cre retains all such records for a minimum period of one year.
- 6. I have personal knowledge that Mon-Cre has established a supervisory review process regarding Mon-Cre's compliance with outbound marketing situations and that Mon-Cre maintains records of such compliance for a minimum period of one year. Mon-

Cre's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Mon-Cre has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this __26th_ day of February, 2008.

MON-CRE TELEPHONE COOPERATIVE, INC.

By:

David Hubbard

As Its: General Manager